

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED FEB 21 2013 1:52

UNITED STATES OF AMERICA,

Plaintiff,

v.

PERRY DINO MARTINI,

Defendant.

Case No.: 13-2-09

18 U.S.C. § 513(a)

FILED IN OPEN COURT

DATE: 3-20-2013

TIME: 2:35 pm

INITIALS: J.J.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTORY STATEMENT

1. AT ALL TIMES RELEVANT TO THIS INFORMATION:

A. The National Air Traffic Controllers Association (NATCA), affiliated with the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), ZME Local is located in Memphis, Tennessee and services air traffic controllers who monitor air traffic coming into and out of the Memphis International Airport along with air traffic travelling through Middle and Western Tennessee, Eastern Arkansas, Northern Mississippi, Northern Alabama, and Southwestern Kentucky. The NATCA AFL-CIO ZME Local is an organized labor union whose members are solely air traffic controllers working out of the Memphis center.

B. The defendant, **PERRY DINO MARTINI** (here in after referred to as MARTINI), was the Financial Secretary of the NATCA AFL-CIO Local ZME. MARTINI'S duties as Financial Secretary was to maintain the business banking accounts, spending, and payment of expenses for the union

C. MARTINI, in his duties as Financial Secretary would write checks that required two authorized signatures on the NATCA union account. MARTINI would write checks to

himself, forge one of the authorized signatures and negotiate said checks for unauthorized non-business related personal expenses. MARTINI would also use the union business credit card and charge unauthorized non-business related personal expenses. MARTINI concealed said embezzlement by altering treasurer reports.

D. The aforementioned scheme fraud committed by MARTINI caused the NATCA AFL-CIO ZME Local to sustain losses of \$47,127.53.

COUNT ONE

On or about February 22, 2008, in the Western District of Tennessee, the defendant,

-----**PERRY DINO MARTINI**-----

did knowingly make, utter, and possess a forged security of an organization, to wit; the NATCA AFL-CIO Local ZME, with the intent to deceive another person and organization. All in violation of Title 18, United States Code, Section 513(a).

DATE: February 20, 2013

for *Michael J. Stanton III*
EDWARD L. STANTON III
UNITED STATES ATTORNEY